

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	CIVIL ACTION FILE
	)	
v.	)	NO. 1:16-CV-03088-ELR
	)	
STATE OF GEORGIA,	)	
	)	
Defendant.	)	

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**JOINT MOTION TO AMEND PROTECTIVE ORDER**

NOW COME Defendant State of Georgia and Plaintiff United States of America (collectively “Parties”), by and through the undersigned counsel, and jointly move the Court for entry of the attached Amended Protective Order. In support of the entry of the proposed Amended Protective Order, the Parties state as follows:

1. On August 11, 2020, this Court granted the Parties’ Joint Motion for Entry of Protective Order. [Doc. 81].
2. The Protective Order requires that the Parties adhere to certain terms and conditions with regard to the use, treatment, disclosure, and maintenance of “Confidential Information” as defined therein. [Doc. 81-1].
3. As discovery progresses in this matter and the breadth of confidential

information and sources thereof are identified, the Parties have recognized a need to clarify the scope of the Protective Order to fully protect the privacy of the students for whom Confidential Information is produced and to provide adequate assurances to same as to the treatment of such Confidential Information.

4. Accordingly, the Parties wish to clarify that the obligations imposed by the Protective Order regarding treatment of Confidential Information extend to all Confidential Information, regardless of the source from which it is obtained by a Party.

Wherefore, the Parties respectfully request the Court enter the attached Amended Protective Order.

Respectfully submitted this 14th day of October, 2021.

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**L.R. 7.1(D) CERTIFICATION**

I certify that the Proposed Joint Motion to Amend Protective Order has been prepared with one of the font and point selections approved by the Court in Local Rule 5.1(C). Specifically, this motion has been prepared using 14-pt Times New Roman Font.

This 14th day of October, 2021.

/s/ Josh Belinfante  
Josh Belinfante  
Georgia Bar No. 047399

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day filed the foregoing document with the Clerk of Court using the CM/ECF system, which will automatically send counsel of record e-mail notification of such filing.

This 14th day of October, 2021

/s/ Josh Belinfante

Josh Belinfante

Georgia Bar No. 047399